

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**In Re:** :  
**JANICE Y THOMAS,** : **Bankruptcy No. 21-11344-amc**  
**Debtor** : **Chapter 13**  
**Wells Fargo Bank, N.A.** :  
**Movant** :  
 :  
 :  
**v.** :  
**JANICE Y THOMAS** : **11 U.S.C. §362**  
  
**and**  
**Kenneth E West, ESQUIRE (TRUSTEE)**

**Respondent(s)** :

**CERTIFICATION OF NO ANSWER REGARDING WELLS FARGO BANK, N.A.'S  
MOTION FOR RELIEF FROM STAY (DE 61)**

The undersigned hereby certifies that, as of September 13, 2022, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before September 2, 2022.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: September 15, 2022

Respectfully submitted,

Brock & Scott, PLLC

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**Respondent(s)** :

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on September 15, 2022 to the following:

JANICE Y THOMAS  
602 WANAMAKER ROAD  
JENKINTOWN, PA 19046

BRAD SADEK, Debtor's Attorney  
Sadek and Cooper  
1315 WALNUT ST STE 502  
PHILADELPHIA, PA 19107

Kenneth E West, Bankruptcy Trustee  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Office of United States Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439  
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